

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 10, 2021

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs with claims against defendant Al Rajhi Bank ("Plaintiffs") and Al Rajhi Bank ("ARB") write in accordance with the Court's Order at ECF No. 7378, to jointly update the Court concerning their meet-and-confer discussions pursuant to that Order.

On December 6, 2021, counsel for Plaintiffs and counsel for ARB held a lengthy meet-and-confer discussion by telephone. During the call, the parties walked through each of the document requests as to which the Court granted discovery, to discuss their respective approaches to discovery on those issues and proposals for production of documents responsive to those requests. ARB identified certain categories of documents and repositories it proposed to include in its searches. Plaintiffs agreed to consider ARB's proposals and, in turn, asked ARB to provide further information concerning the locations where documents and responsive information may be located, and the steps that would be necessary to retrieve responsive documents or information from those repositories.

The parties continue to meet-and-confer, and have set their next call for December 13, 2021, at 10:00 a.m. The parties believe that progress is being made, but anticipate that one or more additional calls will be necessary before they are in a position to make specific proposals to the Court. Plaintiffs and ARB therefore jointly propose that they provide the Court with a further update on or before December 20, 2021.

Honorable Sarah Netburn
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Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

cc: All MDL Counsel of Record (via ECF)